

AO 91 (Rev. 11/11) Criminal Complaint

FELONY**UNITED STATES DISTRICT COURT**for the
Southern District of TexasUnited States District Court
Southern District of Texas
FILED**APR 18 2020**

United States of America)

V.)

Case No. **B-20-MJ-339****David J. Bradley, Clerk of Court**Edgardo SERRANO)*Defendant(s)*)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 17, 2020 in the county of Hidalgo in the Southern District of Texas, the defendant(s) violated:

*Code Section*Title 21, United States Code, Section 846, Title 18, USC
1956*Offense Description*


Conspiracy to possess with intent to distribute 75 kilograms of cocaine, a Schedule II controlled substance ; conducted or attempted to conduct a financial transaction, knowing the property involved in the financial transaction represents the proceeds of some unlawful activity, knowing the transaction was designed to conceal the nature, of the proceeds.

This criminal complaint is based on these facts:

SEE ATTACHMENT



Continued on the attached sheet.

Submitted by reliable electronic means, sworn to and signature attested
as per Fed. Rules Cr. Proc. 4.1**April 18, 2020***Date***Brownsville, Texas***City and State*
Complainant's Signature**Zackary Rhinehart Special Agent***Printed name and title*
Judge's Signature**Ignacio Torteya II U.S. Magistrate Judge***Printed name and title*

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ATTACHMENT A

David J. Bradley, Clerk of Court

1. On April 15, 2020, HSI Special Agents and Task Force Officers (TFOs) seized 59 kilograms of cocaine in Hidalgo County Texas and encountered one subject (source of information- SOI) pursuant to a probable cause traffic stop. During a mirandized interview, the SOI stated the cocaine was part of a bigger load that was to be taken to a "Cuban" truck driver who would bring bulk cash drug proceeds in the form of United States currency to the Rio Grande Valley to purchase the cocaine. The SOI stated the cocaine was intended to be delivered Friday, April 17, 2020 to a location in Hidalgo County, Texas. The SOI stated the tractor truck would be white or black and had a compartment in the fuel tank on the passenger side of the truck and it would not have a trailer.
2. On April 16, 2020, under the direction and supervision of law enforcement, the SOI met with multiple subjects in Hidalgo County, Texas and was given an additional 41.30 kilograms of cocaine to store until Friday for the "Cuban".
3. In the evening of April 16, 2020, during a consensually monitored conversation, the SOI was instructed via telephone to help load 75 of the kilograms of cocaine obtained on the 15th and 16th in the tractor truck of the Cuban. The SOI was told the exchange would occur at [REDACTED] Hidalgo, Texas. The SOI told agents he/she has used this location on several occasions to help the Cuban load the cocaine into compartment and offload the bulk cash drug proceeds.
4. The SOI also told agents the Cuban is present when the cocaine is delivered. The SOI stated "the Cuban" offloads bulk cash from the fuel tank compartment and loads the cocaine into the fuel tank compartment with the assistance of others. The SOI further stated a small trailer or mobile home located on the edge of the carport was used to count the currency that the Cuban delivered.
5. On April 17, 2020, during a consensually monitored conversation, the SOI was told by another individual who was at the lot, that the Cuban was present. Approximately one hour later, law enforcement officers arrived at [REDACTED] Hidalgo, Texas and executed a search warrant that had been obtained for the property and vehicle.
6. During the search, agents observed a tractor truck similar to the truck previously described; a white tractor truck, with no trailer. It was parked besides the trailer described by the SOI and inside the trailer, agents found a money counter and large bags of rubber bands, consistent with items needed to count and organize large quantities of bulk cash.
7. Subjects on the location were identified and photographed. The SOI identified Edgardo SERRANO from a photograph as "the Cuban" that the SOI has helped with loading cocaine into the tractor and the same Cuban the SOI helped to off-load bulk cash drug proceeds. The SOI further stated SERRANO was the intended recipient for the kilograms that law enforcement seized in paragraphs 1 and 2. The SOI told law enforcement he has delivered to Edgardo SERRANO cocaine in amounts of more than 5 kilograms on more


than one occasion in Hidalgo, County, Texas at the instructions of others, and the same individuals instructed the SOI to deliver the cocaine he picked up on April 15 and 16, 2020 to Edgardo SERRANO. SERRANO was at the place by the tractor relayed to the SOI for the intended delivery of cocaine. The SOI also confirmed that in the prior deliveries of cocaine to SERRANO, SERRANO knew where the U.S. Currency was concealed and transferred to the SOI and others the bulk cash drug proceeds when the SOI delivered the cocaine. SOI further confirmed the bulk cash drug proceeds were always concealed in the gas tank when offloaded in the SOIs presence at the time of the exchange of the bulk cash for the cocaine. The SOI had done this on more than one occasion in the past in Hidalgo County with SERRANO and that the SOI knew that SERRANO was coming from out of state to deliver the concealed bulk cash in exchange for the cocaine and would be returning out of state to deliver the cocaine to others. SERRANO was at the place, by the vehicle at the time given by those instructing the SOI, with the money in the gas tank, corroborating the SOI's information of SERRANO's knowledge of the cocaine delivery and bulk cash exchange.

8. SERRANO was asked which vehicle was his and he stated he did not have any vehicles on the location. SERRANO later stated the white truck was his and he was the owner.
9. Agents utilized a currency K-9 on the truck which alerted for the odor of currency. A closer search of the tractor truck revealed a hidden compartment in the truck's passenger side fuel tank, just as described by the SOI. Inside the compartment, agents found forty-four bundles of US currency. There were numbers indicating amounts on each bundle. According to the markings already on the bundles, it is estimated the currency is approximately 1.7 million US dollars. (AGENT NOTE: The official count is pending)
10. SERRANO was placed under arrest and transported to the HSI Office for processing. At the office, SERRANO was advised of his rights and he requested an attorney.
11. Federal prosecution was accepted for SERRANO for Violation of 18 USC 1956-Money Laundering (a) (1) (B) (i) and 21 USC 846-Conspiracy to possess a schedule II-controlled substance, more than five kilograms.


 Zackary Rhinehart, Special Agent
 Homeland Security Investigations

Submitted by reliable electronic means, sworn to and signature attested
 as per Fed. Rules Cr. Proc. 4.1

Date: April 18, 2020


 Ignacio Torteya, III
 United States Magistrate Judge
 Southern District of Texas